

UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents  
Registration Act of 1938, as Amended

JAN 29 1980

For Six Month Period Ending \_\_\_\_\_  
(Insert date)

RECEIVED  
JAN 29 4 12 PM '80  
FEDERAL BUREAU OF INVESTIGATION  
CRIMINAL DIVISION

Name of Registrant \_\_\_\_\_ Registration No. 1421  
Development Counsellors International Ltd.

Business Address of Registrant  
733 Third Avenue-Suite 2100  
NYC, N.Y. 10017

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

not applicable

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Connection Ended
not applicable		

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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not applicable

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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☒

If yes, identify each such person and describe his services.

not applicable

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6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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not applicable

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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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not applicable

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## II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?  
Yes ☒ No ☐

If yes, furnish the following information:

*Name of foreign principal*

French Industrial Development Agency  
St. Lucia National Development Corp.

*Date of Termination*

██████████ August '79  
March '79

- 
9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

United Nations Industrial Development Organization  
821 U.N. Plaza  
NYC, N.Y. 10017

April '79

- (This was not filed last report as we were under the impression that this organization was exempt.)
10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

Netherlands Antilles Economic Mission  
Department of Industrial Development/Gov't of Newfoundland & Labrador  
Trinidad & Tobago Industrial Development Corp.

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## III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Netherlands Antilles--Publicized & informed U.S. businessmen about opportunities in the NA via AD & press releases.  
Newfoundland--No action during this period.  
Trinidad & Tobago--Publicized economic development in T&T via press releases.  
UNIDO--Consultant services ██████████ in connection with developing draft report, development of audio/visual slide presentations, estimates & development of brochures & folders.

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<sup>1</sup>The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

not applicable

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

not applicable

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<sup>2</sup> The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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(see attached listing of Receipts of monies from Foreign Principals)

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Total

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14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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not applicable

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<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

<sup>4</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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(see attached listing of Cash Disbursements of monies for Foreign Principals)

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Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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not applicable

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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not applicable

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V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Netherlands Antilles  
Trinidad & Tobago  
UNIDO

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<sup>5</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?  
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

not applicable

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☒ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams articles  
☒ Advertising campaigns ☒ Press releases ☒ Pamphlets or other publications ☐ Lectures or speeches  
☐ Other (specify) audio/visual slide presentation

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☒ Newspapers ☐ Libraries  
☐ Legislators ☒ Editors ☐ Educational institutions  
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups  
☐ Other (Specify) \_\_\_\_\_

21. What language was used in this political propaganda:

☒ English ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☒ No ☐

## VI - EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup> Yes ☐ No ☒

Exhibit B<sup>7</sup> Yes ☐ No ☒

If no, please attach the required exhibit. (see UNIDO)

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>6</sup> The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup> The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6-month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

not applicable

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

not applicable

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Ted M. Levine  
Ted M. Levine

Emanuel T. Ellenis  
Emanuel T. Ellenis

Subscribed and sworn to before me at 733 Third Avenue, New York, New York

this 28th day of February, 19 80

Reggie K. Anson  
(Signature of Notary Public/Officer)  
Notary Public, State of New York  
No. 31-668717

Qualified in New York County

<sup>8</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.)

Client: Trinidad Tobacco Inc.

733 Third Avenue - Suite 2100

NYC, N.Y. 10017 212-687-1383

U.S. Dept. of Justice Report 7/30/79 to 1/29/80

Date	Details:	Fee	Expenses	Less Foreign Exchange Loss:	Total Receipts	Total DCI Cash Disbursements
1 8/23	6/30	420000	831183		1251183	
2 27	7/31	420000	678961		1098961	
3 10/12	8/31	420000	3137		423137	
4 17	9/30	420000	4419		424419	
5 11/30	10/31	420000	2160		422160	
6 12/27	11/30	420000			420000	
7 1/25	12/31	420000	6074		426074	
8						
9						
10						
11						
12 7/79	Acton Photo	Reprints				1648
13 8/6	ImLevine	Expenses				8701
14 8	ImLevine	Expenses				3240
15 7	The Gazette	Phone Charges				2175
16 9/19	ImLevine	Expenses				1537
17 21	Pennflor Corp.	Storage				2460
18 7	Associated	Messengers				4019
19 10/9	ImLevine	Expenses				400
20 19	David-Johnson Publ.	Publication				4160
21 25	M. Brown	Expenses				2160
22 25	ImLevine	Expenses				2200
23 11/7	ImLevine	Expenses				4030
24 20	F. Knight	Expenses				5980
25 20	ImLevine	Expenses				338
26 11/11	Pennflor Corp.	Storage				2725
27 15	M. Brown	Expenses				4019
28 31	Saddle River Studio	Art				2315
29 31	M. Brown	Expenses				24000
30 31	ImLevine	Expenses				4665
31 11	Associated	Messengers				760
32						400
33						
34						
35						
36						
37						
38						
39						
40						
TOTAL RECEIPTS-----						4465934
TOTAL DISBURSEMENTS-----						88832



of Newfoundland & Labrador

733 Third Avenue - Suite 2100

NYC, N.Y. 10017 212-687-1383

U.S. Dept. of Justice Report 7/30/79 to, 1/29/80

Date	Details:	Fee	Expenses	Less Foreign Exchange Loss:	Total Receipts	Total DCI Cash Disbursements
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12	1979 8/10 E.T. Ellens - Expenses					65.17
13	13 Telephone					34.89
14	9/13 E.T. Ellens - Expenses					50.38
15	13 Telephone					17.15
16	10/13 Telephone					18.43
17	11/13 Telephone					18.13
18	12/13 Telephone					26.45
19	1980 1/31 Evening Telegram Subscription					57.35
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						
32						
33						
34						
35						
36						
37						
38						
39						
40						
TOTAL RECEIPTS-----						
TOTAL DISBURSEMENTS-----						287.55

U.S. Dept. of Justice Report 7/30/79 to, 1/29/80

Date		Details:		Fee	Expenses	Less Foreign Exchange Loss:	Total Receipts	Total DCI Cash Disbursements
TOTAL RECEIPTS-----								
1949	9/19	F. Knight - Expenses						275
10/25	Return Photo - Reports/Negatives							378
11/7	T.M. Levine - Expenses							420
20	F. Knight - Expenses							903
20	T.M. Levine - Expenses							3200
28	T.M. Levine - Expenses							5800
12/12	T.M. Levine - Expenses							2870
18	TGA - Inspection							26500
18	Saddle River Studios - Out							10000
1950	1/23	Return Photo - Reports/Negatives						3752
TOTAL DISBURSEMENTS-----								53898

DEVELOPMENT COURSE ~~RS~~ ~~Inc.~~ Ltd.

733 Third Avenue - Suite 2100

NYC, N.Y. 10017 212-687-1383

Client: French Industrial Development  
Agency

U.S. Dept. of Justice Report 7/50/79 to 1/25/80

Date	Details:	Fee	Expenses	Less	Total	Total DCI
				Foreign		
				Exchange	Receipts	Cash
				Loss:		Disbursements
1	8.6	(5/31 Invoice)	500000		500000	
2						
3						
4						
5						
6						
7						
8						
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36						
37						
38						
39						
40						
TOTAL RECEIPTS -----					500000	
TOTAL DISBURSEMENTS -----						

RECEIVED  
DEPARTMENT OF JUSTICE  
FEB 28 4 12 PM '60  
RECORDS SECTION  
INTERNAL SECURITY  
CRIMINAL DIVISION

President \_\_\_\_\_  
Title \_\_\_\_\_